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UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF CALIFORNIA

In Re:
Todd Allen Dorff

Hilary Ann Dorff

Debtors

Case: 2011-43503
Hearing Date: January 11, 2012
Hearing Time: 10:00 AM
Hon. Robert S. Bardwil
Courtroom 34 - Dept D

DCN: PLC-02

MOTION TO COMPEL ABANDONMENT

Peter Cianchetta, on behalf of Todd Allen Dorff and Hilary Ann Dorff, the Debtors, hereby moves this Court for an Order Compelling the Trustee to Abandon the estate's interest in certain non-real property. This motion is based on the following facts:

1. This case was filed with the Court on September 30, 2011 and Michael Hopper was duly appointed as Trustee.
2. The filed schedules on this case disclose the Debtors' interest in Sole Proprietorship Business Mason Bay Media, and the Wells Fargo Business Checking account ending in 5351 (hereinafter, "ASSET"). Exhibit #1, showing a copy of the relevant portion of Schedule B is attached hereto and incorporated herein by reference. At the time of the filing of the petition, the Debtors placed a 'retail replacement value' on the ASSET, considering its age and condition, at \$18,051.05 (Mason Bay Media \$15,000.00 Account \$3,051.05).

1 3. The Trustee has indicated by telephone he desires the Debtors to file this motion.

2 4. The Trustee has not filed any objection to the Debtors' claim of exemption.

3 5. Pursuant to 11 US Codes §554(b)

4 On request of a party in interest and after notice and a hearing, the court may order the
5 trustee to abandon any property of the estate that is burdensome to the estate or that is of
inconsequential value and benefit to the estate.

6 6. The Debtors therefore assert that the ASSET is burdensome and of inconsequential
7 value to the estate and respectfully move this Court to Order the Abandonment of the
8 estate's interest in this property.

9 Respectfully submitted on December 14, 2011.

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11 /s/ Peter Cianchetta

Peter Cianchetta

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